

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE,

*Plaintiff,*

v.

UNITED STATES DEPARTMENT OF  
HEALTH AND HUMAN SERVICES, et al.,

*Defendants.*

Case No. 1:25-cv-11048

**MOTION FOR ADMISSION *PRO HAC VICE* OF SCOTT A. KELLER**

COMES NOW Steven P. Lehotsky, a member in good standing of the bar of this Court, and moves pursuant to Local Rule 83.5.3 for the admission *pro hac vice* in this case of Scott A. Keller as counsel for Plaintiff President and Fellows of Harvard College.

Mr. Keller is a partner in the law firm of Lehotsky Keller Cohn LLP. He is a member of the bar in good standing in every jurisdiction in which he has been admitted to practice; there are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction; he has not previously had a *pro hac vice* admission to this Court (or other admission for a limited purpose under Local Rule 83.5.3) revoked for misconduct; and he has read and agrees to comply with the Local Rules of the United States District Court for the District of Massachusetts.

**WHEREFORE**, Steven P. Lehotsky requests that Mr. Keller be granted leave to appear and practice *pro hac vice* on behalf of President and Fellows of Harvard College in the above-captioned matter.

Dated: April 23, 2025

Respectfully submitted,

*/s/ Steven P. Lehotsky*

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*Counsel for Plaintiff*

**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), counsel for Plaintiff conferred with counsel for Defendants regarding the filing of this motion. Counsel for Defendants consents to the filing of this motion.

*/s/ Steven P. Lehotsky*  
Steven P. Lehotsky

**CERTIFICATE OF SERVICE**

I, Steven P. Lehotsky, hereby certify that a true copy of this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on April 23, 2025.

*/s/ Steven P. Lehotsky*  
Steven P. Lehotsky